

## Message Text

UNCLASSIFIED

PAGE 01 TORONT 00121 141701Z

ACTION EB-07

INFO OCT-01 EUR-12 ISO-00 AID-05 CIAE-00 COME-00 FRB-01

INR-07 NSAE-00 USIA-15 TRSE-00 XMB-04 OPIC-06 SP-02

CIEP-02 LAB-04 SIL-01 OMB-01 DODE-00 PM-04 H-02 L-03

NSC-05 PA-02 PRS-01 SS-15 /100 W

-----141707Z 044864 /43

R 141509Z JAN 77

FM AMCONSUL TORONTO

TO SECSTATE WASHDC 0000

INFO AMEMBASSY OTTAWA

UNCLAS TORONTO 0121

E.O. 11652: N/A

TAGS: EINV, SOPN, CA

SUBJECT: TORONTO STAR ATTACKS INVESTMENT TAX INCENTIVES

1. IN A JANUARY 13 EDITORIAL "WRONG WAY TO STIMULATE ECONOMY, "THE TORONTO STAR AGREED WITH THE BUSINESS COMMUNITY THAT "THE CANADIAN ECONOMY NEEDS SOME KIND OF STIMULATION IF IT IS NOT TO BE IN RECESSION BY MID-YEAR," BUT STATED ITS OPINION THAT BUSINESS TAX CONCESSIONS "DOESNT LOOK LIKE A GOOD FIRST CHOICE."

2. THE STAR AGREED WITH RECENT FINDINGS BY MONTREAL C.D. HOWE RESEARCH INSTITUTE THAT BOTH CURRENT EXCESS CAPACITY AND THE DOUBTFUL IMPACT OF TAX INVENTIVES IN VIEW OF THE "PRESENT UNSETTLED ECONOMIC ENVIRONMENT" EFFECTIVELY COUNTER THE JUSTIFICATION FOR INCENTIVES BEING ADVANCED BY THE BUSINESS COMMUNITY. THE STAR REFERRED TO THE HOWE REPORT THAT WITH 60 PERCENT OF TOTAL CANADIAN MANUFACTURING SECTOR UNDER FOREIGN CONTROL, SUCH FOREIGN-OWNED FIRMS IN RECENT YEARS HAVE PAID OUT AS MUCH AS ONE-THIRD OF AFTER TAX EARNINGS IN DIVIDENDS TO FOREIGN RESIDENTS.

QUOTE - MOREOVER, CANADAIN TAX CONCESSIONS MAY NOT ONLY LEAD  
UNCLASSIFIED

UNCLASSIFIED

PAGE 02 TORONT 00121 141701Z

TO LARGER DIVIDEND OUTFLOWS. THEY MAY ACTUALLY TRANSFER CANADAIN TAXES TO THE U.S. TREASURY. MOST NON-RESIDENT DIVIDENDS GO TO THE U.S. CURRENT AMERICAN TAX LAW IS SUCH THAT IF FOREIGN TAXES ARE LESS THAN U.S. TAXES, THE PARENT FIRM IS REQUIRED TO PAY THE DIFFERENCE WHEN THE EARNINGS GET TO THE U.S. THIS HAS THE EFFECT OF REDUCING THE EFFECTIVE INCENTIVE OF TAX CONCESSIONS IN CANADA.

THERE IS A FURTHER COMPLICATING FACTOR WHICH OTTAWA DARE  
NOT IGNORE.

SEVERAL PROPOSALS BEFORE THE U.S. CONGRESS WOULD REQUIRE  
U.S.PARENT COMPANIES TO PAY TAX IMMEDIATELY ON PART OR ALL OF  
THEIR SHARE OF INCOME FROM FOREIGN SUBSIDIARIES, WHETHER OR NOT SUCH  
INCOME WAS BROUGHT BACK BY THE PARENT. THIS WOULD MEAN THAT TAX  
CONCESSION GRANTED TO CANADAIN SUBSIDIARIES OF U.S. COMPANIES  
WOULD BE TAXED AWAY, AT LEAST IN PART, BY THE U.S. GOVERNMENT,  
EVEN IF THE EARNINGS WERE KEPT IN CANADA. UNQUOTE.  
DIGGINS

UNCLASSIFIED

NNN

## Message Attributes

**Automatic Decaptioning:** X  
**Capture Date:** 01-Jan-1994 12:00:00 am  
**Channel Indicators:** n/a  
**Current Classification:** UNCLASSIFIED  
**Concepts:** PRESS COMMENTS, TAXES, INVESTMENT OPPORTUNITIES  
**Control Number:** n/a  
**Copy:** SINGLE  
**Sent Date:** 14-Jan-1977 12:00:00 am  
**Decaption Date:** 01-Jan-1960 12:00:00 am  
**Decaption Note:**  
**Disposition Action:** n/a  
**Disposition Approved on Date:**  
**Disposition Case Number:** n/a  
**Disposition Comment:**  
**Disposition Date:** 01-Jan-1960 12:00:00 am  
**Disposition Event:**  
**Disposition History:** n/a  
**Disposition Reason:**  
**Disposition Remarks:**  
**Document Number:** 1977TORONT00121  
**Document Source:** CORE  
**Document Unique ID:** 00  
**Drafter:** n/a  
**Enclosure:** n/a  
**Executive Order:** N/A  
**Errors:** N/A  
**Expiration:**  
**Film Number:** D770014-1245  
**Format:** TEL  
**From:** TORONTO  
**Handling Restrictions:** n/a  
**Image Path:**  
**ISecure:** 1  
**Legacy Key:** link1977/newtext/t19770149/aaaabqtt.tel  
**Line Count:** 73  
**Litigation Code IDs:**  
**Litigation Codes:**  
**Litigation History:**  
**Locator:** TEXT ON-LINE, ON MICROFILM  
**Message ID:** c62371d9-c288-dd11-92da-001cc4696bcc  
**Office:** ACTION EB  
**Original Classification:** UNCLASSIFIED  
**Original Handling Restrictions:** n/a  
**Original Previous Classification:** n/a  
**Original Previous Handling Restrictions:** n/a  
**Page Count:** 2  
**Previous Channel Indicators:** n/a  
**Previous Classification:** n/a  
**Previous Handling Restrictions:** n/a  
**Reference:** n/a  
**Retention:** 0  
**Review Action:** RELEASED, APPROVED  
**Review Content Flags:**  
**Review Date:** 22-Sep-2004 12:00:00 am  
**Review Event:**  
**Review Exemptions:** n/a  
**Review Media Identifier:**  
**Review Release Date:** n/a  
**Review Release Event:** n/a  
**Review Transfer Date:**  
**Review Withdrawn Fields:** n/a  
**SAS ID:** 3589757  
**Secure:** OPEN  
**Status:** NATIVE  
**Subject:** TORONTO STAR ATTACKS INVESTMENT TAX INCENTIVES  
**TAGS:** EINV, SOPN, CA  
**To:** STATE  
**Type:** TE  
**vdkgvwkey:** odb://SAS/SAS.dbo.SAS\_Docs/c62371d9-c288-dd11-92da-001cc4696bcc  
**Review Markings:**  
Margaret P. Grafeld  
Declassified/Released  
US Department of State  
EO Systematic Review  
22 May 2009  
**Markings:** Margaret P. Grafeld Declassified/Released US Department of State EO Systematic Review 22 May 2009